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October 19, 2009

003-09155-02-002
sent via email only

Ms. Carmen Santos
U.S. Environmental Protection Agency Region 9
75 Hawthorne Street
San Francisco, CA 94105

Subject: 1009 66th Avenue, Oakland, California Soil and Concrete Sample Location Rational

On behalf of Aspire Public Schools (Aspire) LFR Inc., an Arcadis Company (LFR) has prepared this letter to provide the rationale for the proposed soil and concrete sample locations to be collected for polychlorinated biphenyls (PCBs) analysis at the former Pacific Electric Motors Site located at 1009 66th Avenue, Oakland, California ("the Site"; Figures 1 and 2). This letter has been prepared in response to the email from the U.S. Environmental Protection Agency (U.S. EPA) to LFR on October 13, 2009 and the telephone conference call on October 19, 2009 between representatives of the U.S. EPA and LFR.

Background

As a result of the communication between LFR and the U.S. EPA, it is our understanding that the U.S. EPA is requesting the collection of additional soil and concrete samples at the Site. To comply with this request, LFR prepared a map of the Site illustrating the locations and analytical results of the soil samples previously collected at the Site, the proposed areas of excavation for PCB-affected soil, and the proposed locations of additional soil and concrete samples to be collected (Figure 2).

As we have discussed, the locations of the soil samples previously collected on the Site were selected based on previous site usage. In addition, if soil samples contained elevated concentrations of PCBs, a "step-out" sample was collected approximately 10 feet from the original soil sample location. This work resulted in the collection of soil samples from approximately 47 locations at the Site. The current proposal is to add 13 more sample locations for a total of 60 locations. This sample distribution will result in approximately one soil sample location for every 1,815 square feet of land across the Site. This frequency does not include the proposed confirmation soil samples to be collected from the proposed areas of excavation. The proposed sample locations as well as the locations and analytical data for soil samples previously collected on Site are illustrated on Figure 2.

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Soil Sampling Rationale

To determine the proposed sample locations, a grid comprised of 75-foot spacing was laid over the 2.5 acre Site. The parking area and the portion of the building that was used as office space (located closest to 66th Avenue) is not included on this grid sampling. The 75-foot spacing was selected so that two transects would run east west across the long axis of the Site; 75-foot transects were then placed to establish the grid pattern. This approach is similar to grid requirements provided in 40 CFR 761 Subpart N, but it accommodates for a larger grid spacing to account for the size of the area being sampled At grid node locations that did not have an existing soil sample within approximately 25 feet of the node, the collection of a soil sample approximately 0.5 to 1.0 feet below ground surface (bgs) is proposed. To further assess soil quality at the Site, three soil samples have been added to the driveways that run along the sides of the former warehouse buildings.

Through the course of the discussions between representatives LFR and the U.S. EPA, it was clear that the former air compressor that was used at the Site, and the sanitary and storm sewer lines could be a source of PCBs in soil at the Site. The air compressor is currently located outside the warehouse building along the south side of the building. To assess soil quality at this location, LFR is proposing to collect two additional soil samples in close proximity to the compressor. In addition, LFR is proposing to collect soil samples adjacent to the sanitary and storm sewer pipelines that are to be abandoned as part of the redevelopment of the Site. The sampling plan along the sewer lines will be to collect one soil sample for every 50 feet of sewer line from approximately 1 to 2 feet below the pipelines.

Based on the size of the Site, the locations of the existing analytical data for soil samples previously collected at the Site for PCB analysis, and the locations of the proposed soil samples, LFR believes that the shallow soil quality (and concrete) will be adequately characterized for the presence of PCBs. LFR will propose additional areas of soil excavation should PCBs be detected above the site specific clean up goal of 0.39 milligrams per kilogram (mg/kg) through the course of the additional soil sampling that is proposed.

Details such as the soil sample collection methods and laboratory analyses will be provided in a work plan that will be prepared in accordance with the self-implementing procedures for cleanup and disposal of PCB remediation (40 CFR 761.61(a)).

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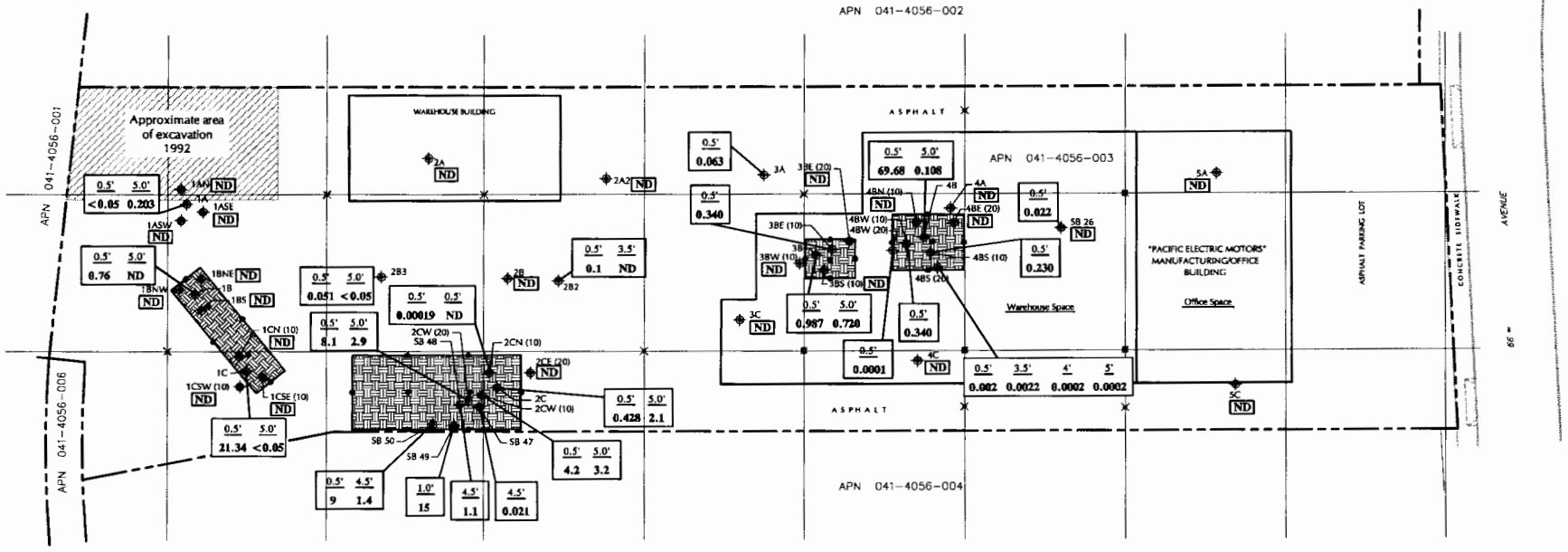
We here at LFR appreciate the time you have provided reviewing this project and appreciate your continued accelerated response on this rationale and work plan that will be transmitted to the EPA by the end of this week. If you have any questions regarding this letter or the project in general, please do not hesitate to contact me at 510-596-9550.

Sincerely,

Ron Goloubow, P.G.
Senior Associate Geologist

Attachments - Figure 1 and 2

cc: Mr. Charles Robitaille – Aspire Public Schools



EXPLANATION:

- 1B — Soil sample location
- ■ Proposed soil and concrete sample location based on a 75'x75' grid spacing (4 locations)
- ● Proposed confirmation soil sample based on a 30'x30' grid spacing
- × Proposed soil sample location based on a 75'x75' grid spacing (9 locations)
- Property line
- Proposed excavation of PCB-affected soil
- 4.5' / 1.1 — Depth in feet / Concentration in mg/kg
- ND = Not detected at or above laboratory reporting limits

0 50 Feet

PCBs Detected in Soil
0 to 5 Feet Below Ground Surface

1009 66TH Avenue, Oakland, California

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